

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: RONALD L. DEITER
Debtor(s)

CHAPTER 13

NO. 24-01637 HWV

11 U.S.C. Section 362

MOTION FOR LEAVE TO FILE 3RD AMENDED PLAN, POST-CONFIRMATION

COMES NOW Ronald L. Deiter, by his counsel, Jerry A. Philpott, Esq., and moves for leave to file a 3rd amended plan in this matter for the following reasons:

1. Mr. Deiter has had ongoing health problems and had a recurrence of his health problems in September, 2024, which caused him to lose work and to fall behind on his obligation to pay his regular mortgage payments.
2. He has continued to pay his plan payments.
3. The provisions of the confirmed 2nd amended plan called for him to pay pre-petition arrears through the plan but at that time he was able to work full time.
4. His pulmonary condition has deteriorated and he has not been working the last few months. He may or may not be able to go to work for the next two months, but he is eligible for retirement from Federal Express commencing August 1, 2025. His first retirement payment will be August 1. Once he gets that he will have a reliable income whether he can work or not
5. Debtor accordingly asks for leave to file a 3rd amended plan putting the mortgage arrears that are stated in the motion plus the arrears that will come up for June and July as *post*-petition into the plan and then start using his regular retirement to finish the plan once he becomes eligible on August 1.

WHEREFORE, Debtor prays for leave to file a 3rd amended plan

Respectfully submitted,

/s/ Jerry A. Philpott
Counsel for debtor
227 N. High St., P.O. Box 116
Duncannon, PA 17020

Dated: June 26, 2025